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**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

VISHAL CHAMARIA, an individual;  
VIVEK CHAMARIA, an individual; PUJA  
CHAMARIA, an individual; GAURI  
CHAMARIA, an individual; P & V, LLC, a  
California limited liability company; CHIP  
SHOP, LLC, a California limited liability  
company.

Case No.: 2:17-CV-02023-JAD-CWH

Plaintiffs,

## ORDER

vs.

TONY M. DIAB, an individual; SHOOK, HARDY & BACON, L.L.P., a Missouri limited liability partnership; MATTHEW GREGORY JONES, an individual; G & M MANAGEMENT SERVICES, INC., a California corporation, dba JONES REAL ESTATE; DOES I through X, individuals; and ROE BUSINESS ENTITIES I through X, inclusive.

## Defendants.

**STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO MOTION TO  
DISMISS FOR LACK OF PERSONAL JURISDICTION (DKT. 20)  
(First Request)**

Plaintiffs VISHAL CHAMARIA, VIVEK CHAMARIA, PUJA CHARMARIA, GAURI CHAMARIA, P & V, LLC, and CHIP SHOP, LLC (collectively, the “Plaintiffs”), by and through their attorney of record ALEXIS L. BROWN, ESQ. of the law office of ALEXIS BROWN LAW, CHTD., and Defendants MATTHEW GREGORY JONES and G & M MANAGEMENT SERVICES, INC., by and through their attorney of record BRADLEY J. HOFLAND, ESQ. of the law office HOFLAND & TOMSHECK, hereby enter into this Stipulation to Extend Time to

1 Respond to Motion to Dismiss for Lack of Personal Jurisdiction (Dkt. 20) (First Request) pursuant  
2 to Fed. R. Civ. P. 6 and L.R. IA 6-1 as follows:

3 WHEREAS on July 31, 2017, Mr. Diab filed Defendant Tony M. Diab's Notice of Motion  
4 and Motion to Dismiss for Lack of Personal Jurisdiction; Memorandum of Points and Authorities  
5 Thereon (the "Diab Motion to Dismiss") (Dkt. 10).

6 WHEREAS on August 8, 2017, Defendants Matthew Gregory Jones and G & M  
7 Management Services, Inc. (the "Jones Defendants") filed a Notice of Motion and Motion to  
8 Dismiss Complaint Against Defendants Matthew Gregory Jones and G & M Management  
9 Services, Inc. for Lack of Personal Jurisdiction (the "Jones Defendants' Motion to Dismiss") (Dkt.  
10 20).

11 WHEREAS Plaintiffs' response to the Jones Defendants' Motion to Dismiss (Dkt. 20) is  
12 currently due August 22, 2017.

13 WHEREAS Plaintiffs assert that jurisdiction over Mr. Diab and the Jones Defendants is  
14 intertwined and, as such, Plaintiffs wish to collectively address the jurisdictional arguments raised  
15 in both the Diab Motion to Dismiss (Dkt. 10) and Jones Defendants' Motion to Dismiss (Dkt. 20).

16 WHEREAS, because of the foregoing, Plaintiffs and Mr. Diab agreed to extend the  
17 deadline to respond to the Diab Motion to Dismiss to August 22, 2017, which was granted by the  
18 Court. *See Order Granting [27] Stipulation to Extend Time re [10] MOTION to Dismiss for*  
19 *Lack of Jurisdiction (Dkt. 28).*

20 WHEREAS Plaintiffs and Diab agreed to the first extension of time to respond to the Diab  
21 Motion to Dismiss to August 22, 2017, the California Automobile Case referred to in Plaintiffs'  
22 Verified Complaint reinstated and has required Mr. Diab's and Plaintiffs' attention.

23 WHEREAS as part of the discussions regarding the California Automobile Case, Mr. Diab  
24 and Plaintiffs have also been engaging in settlement discussions regarding this case.

25 WHEREAS due to the foregoing, Mr. Diab offered to allow Plaintiffs a second requested  
26 extension until August 30, 2017 to respond to the Diab Motion to Dismiss (Dkt. 10). *See*  
27 *Stipulation and Order to Extend Time to Respond to Motion to Dismiss for Lack of Personal*  
28 *Jurisdiction (Dkt. 29).*

WHEREAS the Jones Defendants have similarly agreed to accommodate additional time for the Plaintiffs' to respond to the Jones Defendants' Motion to Dismiss to August 30, 2017 (Dkt. 20).

Based on the foregoing,

IT IS HEREBY STIPULATED that good cause exists to allow Plaintiffs until August 30, 2017 to respond to the Jones Defendants' Motion to Dismiss (Dkt. 20).

DATED this 22<sup>nd</sup> day of August, 2017.

ALEXIS BROWN LAW, CHTD.

*/s/ Alexis L. Brown*

By: Alexis L. Brown (No. 12338)

Attorney for Plaintiffs

DATED this 22<sup>nd</sup> day of August, 2017.

## HOFLAND & TOMSHECK

/s/ Bradley J. Hofland

By: Bradley J. Hofland (No. 6343)

IT IS SO ORDERED.

U.S. DISTRICT COURT JUDGE

DATED: 8/23/2017